

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

ASSOCIATION OF FLIGHT	)	
ATTENDANTS - CWA, AFL-CIO,	)	
	)	Civil Action No.: 1:05CV01036
Plaintiff,	)	
	)	
v.	)	
	)	
PENSION BENEFIT GUARANTY	)	Judge Ellen Segal Huvelle
CORPORATION	)	
	)	
Defendant.	)	
	)	

**PROPOSED ORDER**

Upon consideration of the Pension Benefit Guaranty Corporation's Motion for Entry of an Order Authorizing the Filing of Certain Documents Under Seal and the Memorandum in Support thereof, this Court finds that:

1. Supplement to Volume Twelve of the Administrative Record contains highly confidential and sensitive business information that is subject to a confidentiality agreement between United and PBGC as a result of United's ongoing Chapter 11 Bankruptcy proceedings in the Bankruptcy Court for the Northern District of Illinois;
2. Filing the Confidential Documents under seal is necessary because (i) disclosure of some of them would violate the confidentiality agreement between United and PBGC; (ii) PBGC, a government agency, in the course of fulfilling its statutory mission, has regular need for confidential business information and thus has a compelling interest in honoring its confidentiality agreements; and (iii) disclosure could harm United by giving its competitors and others access to highly

- confidential and proprietary information about the Company's business plans and potential future initiatives;
3. Association of Flight Attendants also has a confidentiality agreement with United; and
  4. Other procedures for protecting the information will not suffice.

THEREFORE, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2005,

ORDERED, that Pension Benefit Guaranty Corporation's Motion for Entry of an Order Authorizing Filing Documents under Seal is granted; and

ORDERED, that the Supplement to Volume 12 of the Administrative Record of the Pension Benefit Guaranty Corporation's Determination to Terminate the United Airlines Flight Attendant Defined Benefit Pension Plan may be filed under seal and remain under seal indefinitely, and access to the documents will be limited to Association of Flight Attendants and Court personnel.

Dated: \_\_\_\_\_  
\_\_\_\_\_  
U.S. District Judge